



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

VIA TELEFAX

September 21, 2001

Site: Herculaneum  
ID# MO0006266373  
Break: 1.0  
Other: 9-21-01

A717

Louis Maruchau  
Vice President Law  
Doe Run Resources Corporation  
Suite 300  
1801 Park 270 Drive  
St. Louis, Missouri 63146

Re: Notification of Need for Additional Work to Address Emergency Conditions  
Administrative Order on Consent  
Docket No. RCRA-7-2000-0018, CERCLA 7-2000-0029

Dear Mr. Maruchau:

This letter is in response to your written request for clarification of several issues related to EPA Region VII's Notification of Need for Additional Work to Address Emergency Conditions, dated September 17, 2001 ("Notification").

First, you are correct that the additional work required by this Notification only includes (1) sampling to be carried out in accordance with the Quality Assurance Project Plan enclosed with the Notification; and (2) cleanup of residential soils where children reside who have been identified as having blood lead levels higher than 10 ug/dl.

Second, you have asked for clarification of the basis for and purpose of the sampling activity being required by the Notification. High levels of lead were detected in recent samples taken on and near haul roads, and at a park and schoolyard in Herculaneum. These results showed that spillage from ore hauling activities may be a significant source of lead contamination in the community, in addition to contamination from other smelter-related sources. Upon review of these results, EPA determined, after consultation with MDNR, that the high levels of lead found in this limited sampling program showed a need for more immediate, widespread sampling of the residential yards, as described in the QAPP. The objective of the expedited sampling is to quickly determine the levels of contamination in residential soils in the community so that risks due to exposure to such contamination, including immediate risks, can be responded to in a timely manner.

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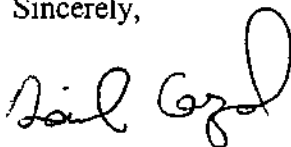
SUPERFUND RECORDS



Finally, the definition of "children" in the QAPP should be 0-72 months of age, as provided in the AOC.

I hope this provides the clarification you are seeking. EPA looks forward to receiving your formal response as to your willingness to undertake this additional work.

Sincerely,

A handwritten signature in black ink, appearing to read "David Cozad". The signature is fluid and cursive, with a large loop at the end of the last name.

David Cozad  
Associate Regional Counsel